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HOFMANN & ASSOCIATES. Attorneys for Plaintiff 360 West 31st Street, Suite 1506 New York, NY 10001-2727 212-465-8840

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ARNOLD JACKSON,

AMENDED
NOTICE OF MOTION TO ADMIT
COUNSEL PRO HAC VICE

Plaintiff,

-against-

07 Civ. 3320

WATERMAN STEAMSHIP CORP.

Defendant

SIRS:

PLEASE TAKE NOTICE THAT upon the annexed certification of Elizabeth Blair
Starkey, dated September 12, 2007 and certifications of Lawrence Anthony Arcell, dated
September 12, 2007, and the attached Certificate of Good Standing annexed thereto,
plaintiff will move this Court before the Honorable Sidney H. Stein at the United States
Courthouse for the Southern District of New York, located at 500 Pearl St., New York,
New York 10007 for an order allowing the admission of Lawrence Anthony Arcell, Esq.
associate of the firm of Hofmann & Associates, attorneys for plaintiff herein and member in
good standing of the Bar of the State of Louisiana, as attorney pro hac vice to argue or try

this case, in whole or in part as counsel for plaintiff Arnold Jackson.

Dated: New York, New York September 19, 2007 HOFMANN & ASSOCIATES Attorneys for Plaintiff

Elizabeth Blair Starkey (ES 8709)

360 West 31st St., Suite 1506 New York, NY 10001

1-212-465-8840

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To: Clerk of the District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Junge & Mele, LLP 29 Broadway, 9th Flr. New York, NY 10006-3101 AFFIDAVIT OF SERVICE

STATE OF NEW YORK) ss.:

COUNTY OF NEW YORK)

GUILLERMO MARTINEZ being duly sworn, deposes and says, that deponent is not a party to the action, is over 18 years of age and resides at 360 West 31st Street, New York, N.Y. 10001. That on the 19th day of September 2007, deponent served the within: "NOTICE OF MOTION, CERTIFICATION OF ELIZABETH STARKEY,

CERTIFICATION OF LAWRENCE A. ARCELL, and proposed ORDER" upon:

Junge & Mele, LLP 29 Broadway, 9th Flr. New York, NY 10006-3101 Fax: (212) 269-0515

by transmitting the papers by electronic means to the telephone number listed above, which number was designated by the attorney for such purpose. I received a signal from the equipment of the attorney served indicating that the transmission was received. I also deposited a true copy of the papers, enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service.

Guillermo-Martinez

Sworn to before me this 19th day of September 2007

Notary Public

GERARD HARRINGTON Notary Public, State of New York No. 01HA6102369

Qualified in New York County Commission Expires Dec. 8. HOFMANN & ASSOCIATES. Attorneys for Plaintiff 360 West 31st Street, Suite 1506 New York, NY 10001-2727 212-465-8840

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ARNOLD JACKSON,

Plaintiff,

CERTIFICATION OF ELIZABETH BLAIR STARKEY IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

-against-

07 Civ. 3320

WATERMAN STEAMSHIP CORP.

Defendant

Pursuant to 28 USC §1746, Elizabeth Blair Starkey hereby declares, under penalty of perjury under the laws of the United States of America, that the following is true and correct:

- 1. My name is Elizabeth Blair Starkey. I am associated with the firm of HOFMANN & ASSOCIATES, counsel for plaintiff Arnold Jackson in this matter. I submit this certification in support of the motion for an order admitting Lawrence Anthony Arcell, Esq., an associate in this firm, to practice before this Court <u>pro hac vice</u> in this case.
- 2. I am a member of the bar of the State of New York, and of the United States

 District Court for the Southern District of New York, having an office for practice located at 360

 West 31st St., Suite 1506, New York, New York 10001. All notices in this matter may be served upon plaintiff at this office.
- 3. I respectfully move the admission of Lawrence Anthony Arcell pursuant to Local Rule 1.3(c).

Dated: September 10, 2007

Elizabeth Blair Starkey

HOFMANN & ASSOCIATES. Attorneys for Plaintiff 360 West 31st Street, Suite 1506 New York, NY 10001-2727 212-465-8840

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ARNOLD JACKSON,

Plaintiff,

CERTIFICATION OF LAWRENCE A.
ARCELL IN SUPPORT OFMOTION TO
ADMIT COUNSEL PRO HAC VICE

-against-

07 Civ. 3320

WATERMAN STEAMSHIP CORP.

Defendant

Pursuant to 28 USC §1746, Lawrence Anthony Arcell hereby declares, under penalty of perjury under the laws of the United States of America, that the following is true and correct:

- 1. My name is Lawrence Anthony Arcell. I am associated with the firm of HOFMANN & ASSOCIATES, counsel for plaintiff Arnold Jackson in this matter. I submit this certification in support of the motion for an order admitting Lawrence Anthony Arcell, Esq., to practice before this Court <u>pro hac vice</u> in this case.
- 2. I am a member in good standing of the bar of the State of Louisiana and of the United States District Court for the Eastern District of Louisiana. I attach a Certificate of Good Standing from the Supreme Court of the State of Louisiana dated 20 August 2007 attesting to my good standing with the courts of Louisiana.
- 3. I have an office for practice located at 4240 Canal Street, New Orleans, LA 70119. Since Hurricane Katrina, I have associated myself with Hofmann & Associates and practice from its office located at 360 West 31st St., Suite 1506, New York, New York 10001. All notices in this matter may be served upon plaintiff at the New York office.

4. I believe good cause for my admission exists due to the positive attorney-client relationship established between the firm of Hofmann & Associates and myself and the plaintiff Arnold Jackson.

WHEREFORE, I respectfully request this Court to grant my application for admission pro hac vice.

Dated: New York, New York

September 12, 2007

Lawrence Anthony Arcell

United States of America

State of Louisiana

Supreme Court of the State of Louisiana

I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana, do hereby certify that

LAWRENCE ANTHONY ARCELL, ESQ., #2513

was duly admitted and licensed to practice as an attorney and counselor at law in this Court and the several courts of the State of Louisiana, on the 24th Day of April, 1981 A.D.; and is currently in good standing, and sufficiently qualified to perform the duties of an attorney and counselor at law.

IN WITNESS WHEREOF, I hereunto sign my name and affix the seal of this Court, at the City of New Orleans, this the 20th Day of August, 2007, A.D.

Clerk of Court
Supreme Court of Louisiana